



October 22, 2013

**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW, Room TW-A325  
Washington, DC 20554

**Re: Ex Parte Communication  
WC Docket No. 13-39**

Dear Ms. Dortch:

On October 21, 2013, Charles McKee and I of Sprint Corp. met with Priscilla Argeris and Christianna Lewis Barnhart of Commissioner Rosenworcel's office to discuss rural call completion. Consistent with its filings in the above-captioned proceeding,<sup>1</sup> Sprint raised the following points:

First, Sprint explained that it has been unable to confirm that there is a widespread problem with rural call completion, or to review the RLEC studies which claim to document the existence of such a problem. Sprint also explained that there are numerous reasons why a call might not complete, and that many of these reasons are beyond the control of the originating carrier.

Second, Sprint explained why the proposed data reporting and retention requirements are overbroad and costly to implement. The Commission will not be able to identify the causes of any call completion problem based on the proposed reports covering billions of call records (Sprint alone handles approximately 1.9 billion interexchange calls per month), and the lack of apparent benefit raises questions about whether the proposed data collection and reporting rules are arbitrary and capricious. Sprint suggested alternative approaches, such as:

- Review of the RLEC rural call completion studies by interested parties to help assess the scope of the alleged problem;
- Call testing under neutral auspices such as regulatory commissions and/or ATIS, with further investigations if the tests identify a problem;
- Use of statistically valid samples rather than reporting and retention of billions of call records.

Third, Sprint stated that if the FCC did adopt data reporting and retention rules, the Commission should give affected carriers sufficient time to implement the IT changes necessary to comply with the new rules; should sunset the rules after a reasonable period of time; and should define "call completion" and "call attempts" to ensure that all carriers are providing the requisite information.

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<sup>1</sup> See Sprint's comments filed May 13, 2013; reply comments filed June 11, 2013.

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Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced docket. If you have any questions, please feel free to contact me at (703) 433-4503.

Sincerely,

*/s/ Norina T. Moy*

Norina T. Moy  
Director, Government Affairs

c: Priscilla Argeris  
Christianna Lewis Barnhart